

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MEDIA MATTERS FOR AMERICA, *et al.*,

Plaintiffs,

v.

WARREN KENNETH PAXTON JR., in his
official capacity as Attorney General of the
State of Texas,

Defendant.

CIV. NO. 23-3363

PLAINTIFFS' EMERGENCY MOTION FOR PROTECTIVE ORDER

Plaintiffs Media Matters for America (“Media Matters”) and Eric Hananoki move for a protective order to prevent Defendants from compelling the presence or testimony of Angelo Carusone, Media Matters’s president, at the January 8, 2024 hearing on Plaintiffs’ motion for a temporary restraining order. The bases and authorities for this motion are set forth in the accompanying memorandum and the accompanying declaration of Angelo Carusone.

Respectfully submitted this 5th day of January, 2024.

/s/ Tina Meng Morrison

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** Application for admission
pending

*** *Pro hac vice* application
forthcoming